



ATTORNEY GENERAL  
LESLIE RUTLEDGE  
ARKANSASAG.GOV

Christine A. Cryer  
Senior Assistant Attorney General

Direct Dial: (501) 683-0958  
Email: christine.cryer@arkansasag.gov

September 21, 2017

Mr. David Stebbins  
123 W. Ridge St., Apt. D  
Harrison, Arkansas 72601

Re: *David Stebbins v. State of Arkansas, et al.*  
USDC Case No.: 4:16-cv-0545-JM

Dear Mr. Stebbins:

Please find enclosed the following:

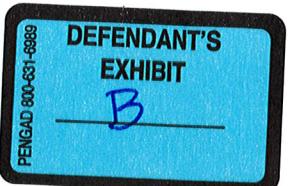
1. Defendants' Responses to Plaintiff's First set of Request for Production of Documents;
2. Defendants' Responses to Plaintiff's Second set of Request for Production of Documents;
3. Defendants' Answers to Plaintiff's Second set of Requests for Admissions;
4. Defendants' Answers to Plaintiff's First set of Interrogatories; and
5. Defendants' Answers to Plaintiff's Third Request for Production and Second Set of Interrogatories.

You have previously been provided with Defendants' Answers to Plaintiff's First set of Requests for Admissions; therefore, those are not enclosed.

Sincerely,  
  
Christine A. Cryer  
Senior Assistant Attorney General

CAC  
Enclosures

323 Center Street, Suite 200, Little Rock, AR 72201  
(501) 682-2007 | oag@ArkansasAG.gov



IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
LITTLE ROCK DIVISION

DAVID A. STEBBINS

PLAINTIFF

v.

CASE NO. 4:16CV545 JM

STATE OF ARKANSAS, ARKANSAS  
REHABILITATION SERVICES, AND  
AMY JONES

DEFENDANTS

**DEFENDANTS' ANSWERS TO PLAINTIFF'S FOURTH SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

COME NOW Defendants State of Arkansas, Arkansas Rehabilitation Services, and Amy Jones, by and through their attorneys, Attorney General Leslie Rutledge and Senior Assistant Attorney General Christine A. Cryer, and for their Answer to Plaintiff's Fourth Set of Interrogatories and Request for Production, states as follows:

**INTERROGATORY NO. 1:** State every reasonable accommodation and every reasonable modification in policies you considered while determining my eligibility for ARS funding, as well as every reason why you struck down those accommodations or modifications.

**ANSWER NO. 1:** Please see Defendants' Response in Opposition to your Motion for Summary Judgment.

**REQUEST FOR PRODUCTION NO. 1:** Produce all evidence in your possession documenting your consideration of the aforementioned accommodations and modifications. If these documents are included in the 130-page file you

Exh. 1

produced in response to my first Request for Production, then please state the page numbers that document the consideration of these accommodations and accommodations [sic].

**ANSWER NO. 1:** Please see Defendants' Response in Opposition to your Motion for Summary Judgment. The Response and the attached to the Response address this issue.

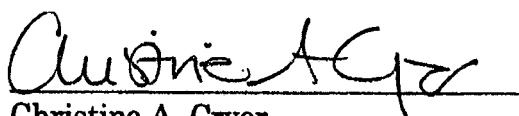
**REQUEST FOR PRODUCTION NO. 2:** In your response to my first Request for Production, you produced a 130 page document that you said was my file with ARS. A majority of these documents were clearly typed. The computer files contain data that the printed versions of the documents simply cannot contain, as long as you know how to view this hidden electronic data. So I can view this data, please produce, on a computer disc, electronic versions of each of the typed documents you produced in response to my first Request for Production.

**ANSWER NO. 2:** Defendants object to producing a computer version of the documents already produced as burdensome and irrelevant. You have the documents. You have used these documents in support of your Motion for Summary Judgment and have relied on them in support of your motion. There is no need for these documents to be produced again but in a different format.

Respectfully submitted,

LESLIE RUTLEDGE  
Attorney General

By:

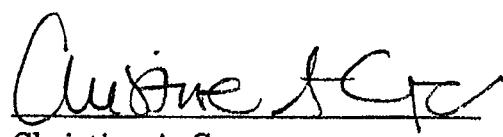
  
Christine A. Cryer  
Ark. Bar No. 2001082  
Senior Assistant Attorney General  
Arkansas Attorney General's Office  
323 Center Street, Suite 200  
Little Rock, AR 72201  
Phone: (501) 683-0958  
Fax: (501) 682-2591  
Email: christine.cryer@arkansasag.gov

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I, Christine A. Cryer, hereby certify that on 17th day of October, 2017, I mailed this document by U.S. Postal Service to the following:

David A. Stebbins  
123 West Ridge Street, Apt. D  
Harrison, AR 72601



Christine A. Cryer